

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**LINDA KING AND TERRI REEKES, on
behalf of themselves and others similarly
situated,**

Plaintiffs,

v.

**TRANSAMERICA PREMIER LIFE
INSURANCE COMPANY, and
MONUMENTAL LIFE INSURANCE
COMPANY,**

Defendants.

Civil Action No. **3:15cv518-HEH**

**MEMORANDUM OF LAW IN SUPPORT OF
JOINT MOTION FOR COURT APPROVAL OF SETTLEMENT**

Plaintiffs Linda King and Terri Reekes (“Plaintiffs”) and Transamerica Premier Life Insurance Company and Monumental Life Insurance Company (“Defendants”), by their respective counsel, submit this memorandum of law in support of their Joint Motion for Court Approval of Settlement (“Motion”) and request this Court enter an Order approving the settlement reached by the Parties as a fair and reasonable settlement of a bona fide dispute of claims arising under the Fair Labor Standards Act, 29 U.S.C. §§ 201 *et seq.* (“FLSA”). In support of the Motion, the Parties state as follows:

1. On August 28, 2015, Plaintiffs filed an FLSA action against Defendants under the FLSA seeking damages for unpaid overtime compensation, liquidated damages, and attorney’s fees.

2. Defendants filed its Answer on September 22, 2015, disputing Plaintiff's claims under the FLSA.

3. On January 11, 2016 the Parties and their counsel attended a settlement conference conducted by U.S. Magistrate Judge, the Honorable David J. Novak. The Parties have now settled this dispute, the terms of which have been reviewed by the Court.

4. The Parties seek approval of the Settlement Agreement from this Court pursuant to Lynn's Food Stores, Inc. v. United States, 679 F.3d 1350 (11th Cir. 1982).

5. The Parties, by counsel, represent to the Court that the proposed settlement is, in their judgment, appropriate, fair, and reasonable and in their best interests under all relevant circumstances.

CONCLUSION

For the reasons previously stated, the Parties respectfully request that this Court enter an Order approving the negotiated settlement as fair, reasonable, and adequate, and dismissing the action with prejudice.

Jointly submitted by:

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of January 2016, I electronically filed the foregoing with the Clerk of the court using the CM/ECF system which will send notification of such filing (NEF) to the following:

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